IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

SNYDERS HEART VALVE LLC Plaintiff, v. ST. JUDE MEDICAL S.C., INC., et al., Defendant.	CIVIL ACTION NO. 4:16-cv-812

STIPULATED MOTION FOR DISMISSAL WITH PREJUDICE

Snyders Heart Valve LLC ("Snyders") and Medtronic, Inc., Medtronic Corevalve LLC; Medtronic Vascular Galway Unlimited; Medtronic Mexico S. De R.L. De C.V.; Medtronic Logistics LLC; Medtronic USA, Inc., Medtronic Public Limited Co., Medtronic CV Luxembourg S.A.R.L., and Medtronic Vascular, Inc. (collectively, "Medtronic") pursuant to Fed. R. Civ. P. 41(a)(2) and (c), hereby move for an order dismissing all claims in this action WITH PREJUDICE, with each party to bear its own costs, expenses and attorney fees.

The parties further request that the Court retain jurisdiction over this matter for the limited purpose of enforcing their settlement agreement.

Dated: June 1, 2017

Respectfully submitted,

/s/ Matthew J. Antonelli
Matthew J. Antonelli
Texas Bar No. 24068432
matt@ahtlawfirm.com
Zachariah S. Harrington
Texas Bar No. 24057886
zac@ahtlawfirm.com
Larry D. Thompson, Jr.

Texas Bar No. 24051428
larry@ahtlawfirm.com
Michael D. Ellis
Texas Bar No. 24081586
michael@ahtlawfirm.com
ANTONELLI, HARRINGTON & THOMPSON LLP
4306 Yoakum Blvd., Ste. 450
Houston, TX 77006
(713) 581-3000

Stafford Davis
State Bar No. 24054605
sdavis@stafforddavisfirm.com
THE STAFFORD DAVIS FIRM
The People's Petroleum Building
102 North College Avenue, 13th Floor
Tyler, Texas 75702
(903) 593-7000
(903) 705-7369 fax

Sarah J. Ring
THE RING LAW FIRM, PLLC
Texas Bar No. 24056213
sring@ringipfirm.com
9654 C Katy Frwy., Box 263
Houston, Texas 77055
Telephone: (281) 772-6541

ATTORNEYS FOR SNYDERS HEART VALVE LLC

Dated: June 1, 2017

/s/ John M. Guaragna

John M. Guaragna
Texas Bar No. 24043308
Aaron G. Fountain
Texas Bar No. 24050619
DLA PIPER LLP (US)
401 Congress Avenue, Suite 2500
Austin, TX 78701-3799
Tel: 512.457.7000
Fax: 512.457.7001
john.guaragna@dlapiper.com
aaron.fountain@dlapiper.com

John Allcock (Pro Hac Vice pending)

CA Bar No. 098895
DLA PIPER LLP (US)
401 B Street, Suite 1700
San Diego, CA 92101-4297
Tel: (619) 699-2700
Fax: (619) 699-2701
john.allcock@dlapiper.com

Drew Wintringham III (Pro Hac Vice pending)
NY Bar No. 1860907
DLA PIPER LLP (US)
1251 Avenue of the Americas
27th Floor
New York, NY 10020-1104
Tel: (212) 335-4500
Fax: (212) 335-4501

Clyde M. Siebman
Texas Bar No. 18341600
300 N Travis St.
Sherman, TX 75090
Tel: (903) 870-0070
Fax: (903) 870-0066
clydesiebman@siebman.com

Elizabeth S. Forrest
Texas Bar No. 24086207
4949 Hedgcoxe Road
Plano, TX 75024
Tel: (214) 387-9100
Fax: (214) 387-9125
elizabethforrest@siebman.com

ATTORNEYS FOR DEFENDANTS MEDTRONIC, INC.; MEDTRONIC COREVALVE LLC; MEDTRONIC VASCULAR GALWAY UNLIMITED; MEDTRONIC MEXICO S. De RL DE C.V.; MEDTRONIC LOGISTICS LLC; MEDTRONIC USA, INC.; MEDTRONIC PUBLIC LIMITED CO.; MEDTRONIC CV LUXEMBOURG S.A.R.L.; AND MEDTRONIC VASCULAR, INC.

CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of June, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Matthew J. Antonelli
Matthew J. Antonelli

CERTIFICATE OF CONFERENCE

I hereby certify that I have conferred with counsel for the Medtronic defendants and they have consented to the filing of this motion as a joint motion.

/s/ Matthew J. Antonelli
Matthew J. Antonelli